

Ex. B

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ERIN CARTWRIGHT WEINSTEIN

Clerk of the Circuit Court

Lake County, Illinois

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

TANYA ABBOTT,

Plaintiff,

vs.

MATTHEW PETER JUDT and WEBB &
GERRITSEN, INC., a corporation,

Defendant.

NO. 19 L 723

JUDGE JOSEPH SALVI

AMENDED COMPLAINT

COUNT I

NOW COMES the Plaintiff, TANYA ABBOTT, by and through her attorney, Robert J. Hauser, LLC., and in complaint against the Defendant, MATTHEW PETER JUDT, states as follows:

1. On or about July 2, 2019, the Plaintiff was the operator of a certain motor vehicle and stopped in westbound traffic on Route 173 near and west of the railroad tracks in the Village of Antioch, Lake County, Illinois.

2. At said time and place the Defendant Judt was the operator of a certain motor vehicle westbound on Route 173 and drove his vehicle into the stopped vehicle of motorist Thomas Peor, which caused his vehicle to be pushed and strike the Plaintiff's stopped vehicle, which in turn caused the Plaintiff's vehicle to be pushed into the stopped vehicle driven by Jillian Thomas.

3. The Defendant Judt had the duty to exercise ordinary care for the safety of others

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and notwithstanding said duty was guilty of negligence in one or more of the following respects:

- a. Failed to maintain a proper look-out;
- b. Failed to reduce speed to avoid an accident in violation of the Illinois Motor Vehicle Code;
- c. Drove his vehicle at a speed greater than reasonable and proper under the circumstances then existing in violation of the Illinois Motor Vehicle Code;
- d. Failed to maintain his vehicle under proper control; and,
- e. Was otherwise negligent.

4. As a direct and proximate result of the aforesaid negligent acts and/or omissions of the Defendant Judt, the Plaintiff was injured in her person and has incurred substantial medical expenses in an attempt to cure herself of her injuries and her medical conditions were aggravated due to the negligence of the Defendant necessitating further medical care and lost time from her employment.

WHEREFORE, the Plaintiff, TANYA ABBOTT demands judgement against the Defendant, MATTHEW PETER JUDT, in an amount in excess of the minimum jurisdictional requirements for the Law Division of the 19th Judicial Circuit plus cost of suit.

COUNT II

NOW COMES the Plaintiff, TANYA ABBOTT, by and through her attorney, Robert J. Hauser, LLC., and in complaint against the Defendant, WEBB & GERRITSEN INC., a corporation, states as follows:

1. The Defendant, WEBB & GERRITSEN, INC., is and was a corporation authorized to do business in the State of Illinois at all times relevant herein.

2. At the time of the July 2, 2019 automobile accident, the Defendant, MATTHEW

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JUDT, was acting as the agent and/or employee of the Defendant, WEBB & GERRITSEN, INC.

3. The Defendants had the duty to exercise ordinary care for the safety of others and notwithstanding said duty were guilty of negligence in one or more of the following respects:

- a. Failed to maintain a proper look-out;
- b. Failed to reduce speed to avoid an accident in violation of the Illinois Motor Vehicle Code;
- c. Drove their vehicle at a speed greater than reasonable and proper under the circumstances then existing in violation of the Illinois Motor Vehicle Code;
- d. Failed to maintain their vehicle under proper control; and,
- e. Was otherwise negligent.

4. As a direct and proximate result of the aforesaid negligent acts and/or omissions of the Defendants, the Plaintiff was injured in her person, her pre-existing cervical condition was aggravated and substantial medical expenses have been incurred in an attempt to cure herself of her injuries as well as lost time from her employment.

WHEREFORE, the Plaintiff, TANYA ABBOTT demands judgement against the Defendant, WEBB & GERRITSEN, INC., a corporation, in an amount in excess of the minimum jurisdictional requirements of the 19th Judicial Circuit of Lake County, Illinois.

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